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d/b/a MGM Grand*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MGM GRAND HOTEL, LLC d/b/a MGM
GRAND,

Plaintiff,

v.

KEVIN CHANG SHENG LONG,

Defendant.

Case No. 2:21-cv-001476-APG-NJK

**STIPULATION AND ORDER TO
CONDUCT DEPOSITION OF
JENNIFER LONG AFTER CLOSE OF
DISCOVERY**

Plaintiff MGM Grand Hotel, LLC d/b/a MGM Grand ("MGM"), by and through its counsel, Lawrence J. Semenza, III, Esq., and Katie Cannata, Esq., of the law firm Semenza Kircher Rickard, and Defendant Kevin Chang Sheng Long ("Long"), by and through his counsel, Lawrence C. Hill, Esq., of Lawrence C. Hill & Associates (together, the "Parties"), hereby stipulate and agree to the following:

1. On April 8, 2022, MGM served a Notice of Subpoena for Deposition and to Produce Information in a Civil Action (the "Subpoena") to Jennifer Long ("J. Long"), as well as a Notice of Deposition of J. Long. As set forth therein, MGM noticed J. Long's deposition for April 27, 2022.

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1 2. J. Long is a witness in this matter and is the sister of Long. Specifically, J. Long
2 previously coordinated and/or made partial payments toward the credit instruments at issue in
3 this matter on behalf of Long. Accordingly, MGM believes that J. Long possesses valuable and
4 relevant information concerning this action and thereby wishes to depose her.

5 3. MGM made multiple attempts to personally serve J. Long with the Subpoena.

6 4. On April 22, 2022, counsel for J. Long – Aparna S. Mathur, Esq. of Bird, Marella,
7 Boxer, Wolpert, Nessim, Drooks, Licenberg & Rhow, P.C. – contacted MGM requesting that it
8 reschedule J. Long's deposition for approximately thirty (30) days after April 27, 2022. J. Long's
9 counsel also agreed to accept service of the Subpoena.

10 5. The current discovery deadline in this matter is April 27, 2022.

11 6. To accommodate both J. Long and her counsel, the Parties have agreed to
12 reschedule J. Long's deposition for May 27, 2022, *i.e.* after the close of discovery in this matter.

13 7. Conducting J. Long's deposition after the close of discovery will not impact or
14 delay this action's trajectory. As the Court is aware, MGM filed a Motion for Summary
15 Judgment on February 10, 2022 (the "MSJ"). (ECF No. 22.) Long filed an Opposition to the
16 MSJ on February 22, 2022, and MGM filed its Reply on March 15, 2022. (ECF Nos. 23, 28.)
17 To date, no hearing has been scheduled. Thus, J. Long's deposition will have no impact on the
18 filing and/or adjudication of dispositive motions in this matter.

19 8. Moreover, the deadline for the Parties to submit their joint pre-trial order will be
20 suspended until MGM's MSJ is adjudicated. (*See* ECF No. 20.) As such, the timing of the
21 Parties' joint pre-trial order will not be impacted by J. Long's May 27, 2022 deposition.

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1 9. Considering the foregoing, MGM and Long stipulate and agree that J. Long's
2 deposition be conducted after the close of discovery in this matter, on May 27, 2022.

3 This stipulation is made in good faith and not submitted for any improper purpose.

4 DATED this 27th day of April, 2022.

DATED this 27th day of April, 2022.

5 SEMENZA KIRCHER RICKARD

LAWRENCE C. HILL & ASSOCIATES

6 /s/ Lawrence J. Semenza, III

/s/ Lawrence C. Hill

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9 *Attorneys for Plaintiff*

Attorneys for Defendant

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12 IT IS SO ORDERED.

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United States Magistrate Judge

14 Dated: April 28, 2022
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